

EXHIBIT 7

From: Curtis, Nathan R.
Sent: Tuesday, February 2, 2021 10:00 AM
To: Sheasby, Jason; LTL-Kaifi-T-Mobile@ltlattorneys.com
Cc: Dat Nguyen; melissa@gillamsmithlaw.com; Michael Song; Enoch Liang; ~Bunt, Robert; ~Attaway, Deana; Kelsey Atkinson; Matthew Hawkinson; Steve Chang; *** TMUS-Kaifi_C
Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

Counsel,

Upon review, KAIFI's Supplemental Infringement Contentions improperly expand KAIFI's theories of infringement. For example, in its Supplemental Infringement Contentions, KAIFI for the first time contends that the "location register can be distributed across components in the system" and that location information "can be in part on the user equipment." See Supp. Inf. Cont. at 16–17, 35–36, 40, 44, 56, 64–65, 81, 85, 103, 110. These expanded theories are not responsive to the questions T-Mobile raised, as you asserted in your January 8, 2021 email. Please explain the basis for KAIFI's supplementation.

Best,
Nathan

Nathan R. Curtis

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From: Sheasby, Jason <JSheasby@irell.com>
Sent: Thursday, January 14, 2021 9:54 AM
To: Curtis, Nathan R. <NCurtis@gibsondunn.com>
Cc: Dat Nguyen <dat.nguyen@ltlattorneys.com>; Dominguez, Kate <KDominguez@gibsondunn.com>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com>; Kremer, Paul J. <PKremer@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; melissa@gillamsmithlaw.com; Michael Song <michael.song@ltlattorneys.com>; Enoch Liang <Enoch.Liang@ltlattorneys.com>; ~Bunt, Robert <rcbunt@pbatyler.com>; ~Attaway, Deana <dattaway@pbatyler.com>; Kelsey Atkinson <kelsey.atkinson@ltlattorneys.com>; Matthew Hawkinson <mhawkinson@hycounsel.com>; Steve Chang <steve.chang@ltlattorneys.com>
Subject: Re: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]
Sure.

Best
JS

On Jan 14, 2021, at 7:35 AM, Curtis, Nathan R. <NCurtis@gibsondunn.com> wrote:

Jason,

We are still reviewing KAIFI's proposed Supplemental Disclosure of Asserted Claims and Infringement Contentions and will get back to you on whether we oppose a motion. It will expedite our review if you are able to send a redline showing the edits made.

Best,
Nathan

Nathan R. Curtis

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From: Sheasby, Jason <JSheasby@irell.com>
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Subject: RE: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

[External Email]
All:

Although we do not believe it is required given the nature of these amendments, please let us know if you object to a motion.

Best
JS

From: Dat Nguyen <dat.nguyen@ltlattorneys.com<<mailto:dat.nguyen@ltlattorneys.com>>>
Sent: Tuesday, January 12, 2021 10:22 AM
To: ncurtis@gibsondunn.com<<mailto:ncurtis@gibsondunn.com>>; Dominguez, Kate <KDominguez@gibsondunn.com<<mailto:KDominguez@gibsondunn.com>>>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com<<mailto:BHershkowitz@gibsondunn.com>>>; PKremer@gibsondunn.com<<mailto:PKremer@gibsondunn.com>>; [jkrevitt@gibsondunn.com](mailto:jkrevelt@gibsondunn.com)<<mailto:jkrevelt@gibsondunn.com>>; ~Smith, Melissa <melissa@gillamsmithlaw.com<<mailto:melissa@gillamsmithlaw.com>>>
Cc: Michael Song <michael.song@ltlattorneys.com<<mailto:michael.song@ltlattorneys.com>>>; Enoch Liang <Enoch.Liang@ltlattorneys.com<<mailto:Enoch.Liang@ltlattorneys.com>>>; ~Bunt, Robert <rcbunt@pbatyler.com<<mailto:rcbunt@pbatyler.com>>>; ~Attaway, Deana <dattaway@pbatyler.com<<mailto:dattaway@pbatyler.com>>>; Kelsey Atkinson

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Subject: KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile

Counsel,

Please find attached KAIFI LLC's Supplemental Disclosure of Asserted Claims and Infringement Contentions under P.R. 3-1 to T-Mobile.

Best,
Dat

DAT NGUYEN

<image001.png>

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